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13 *Attorneys for Debtors and Debtors in Possession*

14 **UNITED STATES BANKRUPTCY COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC  
COMPANY,**

21 **Debtors.**

22  Affects PG&E Corporation  
23  Affects Pacific Gas and Electric Company  
24  Affects both Debtors

25 \* *All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

26 Bankruptcy Case  
No. 19-30088 (DM)

27 Chapter 11  
(Lead Case) (Jointly Administered)

28 **STIPULATION BETWEEN DEBTORS  
AND AD HOC COMMITTEE OF SENIOR  
UNSECURED NOTEHOLDERS  
EXTENDING TIME TO RESPOND TO  
MOTION OF THE AD HOC  
COMMITTEE OF SENIOR UNSECURED  
NOTEHOLDERS TO TERMINATE THE  
DEBTORS' EXCLUSIVE PERIODS  
PURSUANT TO SECTION 1121(d)(1) OF  
THE BANKRUPTCY CODE**  
Re: Dkt. No. 2741

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Ad Hoc Committee  
4 of Senior Unsecured Noteholders (the “**Noteholders Committee**”), on the other. The Debtors  
5 and the Noteholders Committee are referred to in this Stipulation and Agreement for Order  
6 collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as  
7 follows:

## RECITALS

9           A.     On July 11, 2019, the Noteholders Committee filed the *Motion of Ad Hoc*  
10           *Committee of Senior Noteholders to Terminate the Debtors' Exclusive Periods Pursuant to*  
11           *Section 1121(d) of the Bankruptcy Code* [Dkt. No. 2741] (the "**Noteholders Motion to**  
12           **Terminate Exclusivity**"), which is set for a hearing before the Court at 9:30 a.m. on July 24,  
13           2019. Any response or opposition to the Noteholders Motion to Terminate Exclusivity is due by  
14           4:00 p.m. (Pacific Time) on July 17, 2019.

15           B.       Counsel for the Debtors has requested, and counsel for the Noteholders  
16 Committee has agreed, that the time for the Debtors to respond to the Noteholders Motion to  
17 Terminate Exclusivity be extended.

18        NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE  
19        INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS  
20        STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE  
      UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,  
      THAT:

22                   1. The time for the Debtors to file and serve any response or opposition to the  
23 Noteholders Motion to Terminate Exclusivity is extended through 4:00 p.m. (Pacific Time) on  
24 July 18, 2019.

26 [Signatures on next page]

Dated: July 12, 2019  
KELLER & BENVENUTTI LLP

/s/ Jane Kim  
Jane Kim  
*Attorneys for Debtors  
and Debtors in Possession*

Dated: July 12, 2019  
AKIN GUMP STRAUSS HAUER &  
FELD LLP

/s/ Ashley Vinson Crawford  
Ashley Vinson Crawford  
*Attorneys for Ad Hoc Committee of Senior  
Unsecured Noteholders*